

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

CLERK U.S. DISTRICT COURT
NORTHERN DIST. OF TX
LUBBOCK DIVISION

2021 OCT 13 PM 3:55

UNITED STATES OF AMERICA

v.

THOMAS JOHN BOUKAMP

No. 5:20-CR-165-H
(Supersedes superseding indictment filed on
07/14/21)

DEPUTY CLERK 

SECOND SUPERSEDING INDICTMENT

The Grand Jury Charges:

Count One

Transportation of a Minor with Intent to Engage in Criminal Sexual Conduct
(Violation of 18 U.S.C. § 2423(a))

From on or about November 13, 2020, to on or about November 22, 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Thomas John Boukamp**, defendant, did knowingly transport an individual who had not attained the age of 18 years in interstate and foreign commerce, with the intent that such individual engage in sexual activity for which any person can be charged with a criminal offense, that is, a violation of Michigan Penal Code Section 750.520d, which makes it a crime to engage in sexual penetration with another person when the other person is at least 13 years of age and under 16 years of age.

In violation of Title 18, United States Code, Section 2423(a).

Count Two

Travel with Intent to Engage in Illicit Sexual Conduct
(Violation of 18 U.S.C. § 2423(b))

From on or about November 11, 2020, to on or about November 22, 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Thomas John Boukamp**, defendant, did knowingly travel in interstate commerce for the purpose of engaging in any illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f).

In violation of Title 18, United States Code, Section 2423(b).

Count Three

Enticement and Attempted Enticement of a Minor
(Violation of 18 U.S.C. § 2422(b))

From on or about August 31, 2020, to on or about November 22, 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Thomas John Boukamp**, defendant, did knowingly use a facility and means of interstate and foreign commerce, including a computer, to persuade, induce, and entice, and attempt to do so, an individual who had not attained the age of eighteen (18) years, to engage in sexual activity for which **Boukamp** could be charged with a criminal offense, that is, a violation of Michigan Penal Code Section 750.520d, which makes it a crime to engage in sexual penetration with another person when the other person is at least 13 years of age and under 16 years of age.

In violation of Title 18, United States Code, Section 2422(b).

Count Four
Receipt of Child Pornography
(Violation of 18 U.S.C. §§ 2252(a)(2) and (b))

On or about October 9, 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Thomas John Boukamp**, defendant, did knowingly receive a visual depiction, that had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, that is: the lascivious exhibition of the genitals and pubic area of said minor, and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2) and (b).

Count Five
Cyber Stalking
(Violation of 18 U.S.C. §§ 2261A(2) and 2261(b)(4))

From on or about a date unknown to the grand jury, to on or about November 13, 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Thomas John Boukamp**, defendant, with intent to injure, harass, and intimidate “Jane Doe,” a person under the age of 18, used an interactive computer service, an electronic communication service, an electronic communication service of interstate commerce, and facilities of interstate and foreign commerce, to engage in a course of conduct that caused, attempted to cause, and would reasonably be expected to cause substantial emotional distress to Doe, and in doing so, knowingly engaged in a sexual act with “Jane Doe,” a person who had attained the age of 12 years, but not attained the age of 16 years, and was at least four years younger than Boukamp, in violation of Title 18, United States Code, Section 2243(a), without regard to whether the offense was committed in the special maritime and territorial jurisdiction of the United States or in a Federal prison.

In violation of Title 18, United States Code, Sections 2261A(2) and 2261(b)(4).

Count Six
Receipt of Child Pornography
(Violation of 18 U.S.C. §§ 2252(a)(2) and (b))

On or about May 1, 2020, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Thomas John Boukamp**, defendant, did knowingly receive a visual depiction, that had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and was produced using materials which had been mailed and shipped and transported using any means and facility of interstate and foreign commerce, including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, that is: the lascivious exhibition of the genitals and pubic area of said minor, and such visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2) and (b).

Counts Seven - SixteenProduction and Attempted Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a))

On or about the dates set forth below, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Thomas John Boukamp**, defendant, did use, persuade, induce, and entice, and attempt to do so, "Jane Doe," a person under the age of 18 years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted in interstate and foreign commerce, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer:

Count	File Name	Hash Value	Date Received
7	IMG_6575	f6789d094cae68d11354be98da53f9d1	April 28, 2020
8	IMG_6690	66ca6c518f40fb8d8fad9eaedcc3c921	May 2, 2020
9	IMG_6948	847bc8e723c1b5cfa6bb24466eee9c1b	May 16, 2020
10	IMG_6949	96c2ab5a52d4293d981dd43cc16bec	May 16, 2020
11	IMG_6950	1d9e01738ef19ca5a6caf6803d2ea3b	May 16, 2020
12	IMG_7062	061f64ede210e24e5ae8849db0f9d25d	May 23, 2020
13	IMG_7613	1eab0a76d0bf3467baa8dcb4f221ef63	June 22, 2020
14	IMG_8054	e0ad2e87e8a75d90717d6a6f0f423bde	July 17, 2020
15	IMG_8055	7f974d37aca1b12d1e2e071d0494ddb5	July 17, 2020
16	IMG_8094	79408874d5ed945830b7b5fdcb247eff	July 20, 2020

Each count being a violation of Title 18, United States Code, Section 2251(a).

Forfeiture Notice
(18 U.S.C. §§ 2253, 2428)

Upon conviction of an offense alleged in Counts One through Sixteen, and pursuant to 18 U.S.C. §§ 2253 and 2428(b), defendant **Thomas John Boukamp**, shall forfeit to the United States of America: (a) any visual depiction described in Section 2251, 2252A, 2252, 2252A, 2252B, or 2260 of Chapter 110, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from any offense alleged in the second superseding indictment; (c) any property, real or personal, used or intended to be used to commit or to promote the commission of any offense alleged in the second superseding indictment, and any property traceable to such property; and (d) any property, real or personal, used or intended to be used to commit or to facilitate the commission of any violation of Chapter 117; and (e) any property, real or personal, that constitutes or is derived from proceeds traceable to any violation of Chapter 117.

The above-referenced property subject to forfeiture includes, but is not limited to, the following:

- Any items of digital media seized by law enforcement from the defendant or his residence on November 22, 2020;

If any of the property described above, as a result of any act or omission of the defendant:

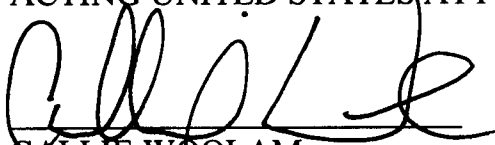
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2428(a), to seek forfeiture of any other property of the said defendant up to the value of the forfeitable property described above.

A TRUE BILL


FOREPERSON

CHAD E. MEACHAM
ACTING UNITED STATES ATTORNEY


CALLIE WOOLAM

Assistant United States Attorney
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
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THOMAS JOHN BOUKAMP

SECOND SUPERSEDING INDICTMENT

- COUNT 1: TRANSPORTATION OF A MINOR WITH INTENT TO ENGAGE
IN CRIMINAL SEXUAL CONDUCT
Title 18, United States Code, Section 2423(a).
- COUNT 2: TRAVEL WITH INTENT TO ENGAGE IN ILLICIT SEXUAL
CONDUCT
Title 18, United States Code, Section 2423(b).
- COUNT 3: ENTICEMENT AND ATTEMPTED ENTICEMENT OF A
MINOR
Title 18, United States Code, Section 2422(b).
- COUNT 4: RECEIPT OF CHILD PORNOGRAPHY
Title 18, United States Code, Sections 2252(a)(2) and (b).
- COUNT 5: CYBER STALKING
Title 18, United States Code, Sections 2261A(2) and 2261(b)(4).
- COUNT 6: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).
- COUNT 7: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

COUNT 8: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

COUNT 9: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

COUNT 10: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

COUNT 11: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

COUNT 12: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

COUNT 13: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

COUNT 14: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

COUNT 15: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

COUNT 16: PRODUCTION AND ATTEMPTED PRODUCTION OF CHILD
PORNOGRAPHY
Title 18, United States Code, Section 2251(a).

(16 COUNTS + FORFEITURE)

A true bill rendered,

Lubbock



Foreperson

Filed in open court this 13th day of October, A.D. 2021

Clerk

Defendant in federal custody.



UNITED STATES MAGISTRATE JUDGE